

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**STEVEN HOOK,**

Defendant.

**No. 19-MJ-2045-DPR-01**

**UNITED STATES' MOTION FOR PRETRIAL DETENTION AND FOR  
A HEARING PURSUANT TO 18 U.S.C. § 3142(e) and (f)**

The United States of America, through Timothy A. Garrison, United States Attorney for the Western District of Missouri, and Abram McGull II, Assistant United States Attorney requests pretrial detention and a detention hearing pursuant to 18 U.S.C. § 3142 (e)(3)(A) and (B), and (f)(1)(C). At this hearing the evidence will demonstrate that no condition or combination of conditions of release will reasonably assure the defendant's appearance as required by the Court and the safety of other persons and the community.

**SUPPORTING SUGGESTIONS**

1. Subsection 3142(f)(1), Title 18, United States Code, provides that a hearing must be held by the appropriate judicial officer to determine whether any condition or combination of conditions will reasonably assure the defendant's appearance and the safety of any other person in the community if the attorney for the government moves for such a hearing and if the defendant is charged with an offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act described in subparagraphs (C). 18 U.S.C. § 3142 (f)(1) (A – E).

2. The statute recognizes two additional situations which allow for a detention hearing and which can be raised either by the attorney for the government or by a judicial officer. These conditions are:
  - a. When there is a serious risk that the defendant will flee; or,
  - b. When there is a serious risk that the person will "obstruct or attempt to obstruct justice, or threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness or juror."
3. One or more grounds for a pretrial detention hearing as set forth by the statute exists in the above cause.
4. On June 3, 2019, a federal magistrate seated in Springfield, Missouri, found probable cause that the defendant was involved in conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine.
5. The nature and circumstances of this charged offense, the weight of the evidence, and the nature and seriousness of the danger to any person or the community that would be posed by the defendant's release because of his participation in the conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine demonstrate that there are no conditions or combination of conditions set forth in 18 U.S.C. § 3142(c) that will reasonably assure the safety of other persons and the community and the appearance of the defendant as required.
6. This criminal complaint creates a rebuttable presumption that no condition or combination of conditions will reasonably assure the appearance of the defendant and the safety of the community.

7. In addition, this defendant, has the following criminal convictions that demonstrate he is a danger to the community:
- a) On or about July 14, 1999, the defendant was convicted for theft in Indiana where he received 2 year suspended imposition of sentence.
  - b) On or about December 13, 1999, the defendant was convicted of a residential entry in Indiana where he was sentence to 3 years and the court suspended execution of his sentence for 2.5 years.
  - c) On or about August 27, 2003, the defendant was convicted of theft in Indiana where he was sentenced to 3 years and placed on probation for 2 years. However, he was revoked and had to serve 30 months in prison.
  - d) On or about February 22, 2012, the defendant was convicted of theft in Indiana where he was sentenced to 3 years in prison.
  - e) The defendant is a resident of Indiana and he has no ties to the Western District of Missouri. Thus, he is a flight risk.
8. Based upon the foregoing, there are no conditions or combination of conditions set forth in 18 U.S.C. § 3142(c) that will reasonably assure the appearance of the defendant as required and the safety of other persons and the community.

WHEREFORE, the United States requests a pretrial detention hearing and that the defendant be detained.

Respectfully,

Timothy A. Garrison  
United States Attorney

By /s/ Abram McGull II  
Abram McGull II  
Assistant United States Attorney  
Missouri Bar No. 40553  
901 St. Louis Street  
Springfield, Missouri 65806  
(417) 831-4406

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was delivered on June 4, 2019, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Abram McGull II  
Abram McGull II  
Assistant United States Attorney